

EXHIBIT

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ATTORNEY VERIFICATION

VERIFICATION

I, the undersigned, am the attorney for the Petitioners, Idalia Ochoa Dominguez and Marco Antonio Aragon Leon. I am making this verification on behalf of Petitioners who are out of the United States and living in Morelos, Mexico, and hereby declare as follows:

1. The allegations in the above complaint are true based on my review of records provided by the Mexican Ministry of Foreign Affairs Central Authority for the Hague Abduction Convention and the United States Department of State, Office of Children's Issues, documentation and photographs provided by my clients, and interviews I have had with the clients.
2. Notice of the application for the Temporary Restraining Order *Ne Exeat* should not be given to the Respondent WENDI OCHOA PEREZ.
3. The Petitioners minor children J.A.D. and W.Y.A.D. are wrongfully retained by Respondent in Orange County, NY, USA since on or about September 27, 2022.
4. Respondent has permitted Petitioners no meaningful access to the minor children since July, 2023.
5. The injury alleged in the foregoing Petition and corresponding Motion for Temporary Restraining Order is further denial of Petitioners' access to their minor children by the Respondent and further loss of the mutual relationship between the Petitioners and their minor children. The Petitioner's custodial relationship and ongoing contact with the minor children is absolutely unique and time lost can never be made up. The harm and psychological damage caused to a child who is unilaterally removed from his custodial parents damages that child in a way that can be only be addressed, but not fully repaired. It is a unique deprivation that is at its core, irreparable. Thus, if the Respondent is put on notice that an order preventing further concealment of the children has

not yet been issued, the greater the danger that Respondent will further conceal or change the minor children's present location.

6. I make this statement Pursuant to F.R.C.P. 65(b) (2) and declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct to the best of my knowledge.

Respectfully submitted on this the 21st day of June, 2024.

/s/ Soraya Ruiz Abderrashman

SORAYA RUIZ ABDERRASHMAN

SDNY BAR # SR2671

ATTORNEY FOR PETITIONERS